

Hughes Hubbard & Reed LLP One Battery Park Plaza New York, New York 10004-1482 Telephone: +1 (212) 837-6000 Fax: +1 (212) 422-4726 hugheshubbard.com

November 25, 2019

## **VIA ECF**

Hon. Jesse M. Furman United States District Judge Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007 (212) 805-0282

Re: Bromfield-Thompson v. American University of Antigua, et al.,

Civil Action No. 19-CV-6078 (JMF) (S.D.N.Y.)

Dear Judge Furman:

We are counsel for American University of Antigua ("AUA") and Manipal Education Americas, LLC ("MEA"), and submit this joint letter on behalf of AUA, MEA and National Board of Medical Examiners ("NBME") in response to the Court's November 18, 2019 Order (ECF No. 31).

We have conferred with counsel for NBME, and the defendants believe that it is not feasible to file a consolidated response to Plaintiff's Complaint. However, in order to reduce the burden of repetitive filings on the Court, AUA and MEA will make a good faith effort to join in or incorporate by reference into their own motion to dismiss any arguments that NBME already has made in its pending motion that may be common to AUA and/or MEA. Accordingly, and pursuant to the Court's November 18 Order, AUA and MEA will file their response to Plaintiff's Complaint on or before December 9, 2019.

Respectfully submitted,

/s/ Robb W. Patryk

Robb W. Patryk

cc: All Counsel of Record (via ECF)